

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
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2004 JUN 17 P 12:41

AMY RIVERA, ADMINISTRATRIX OF
THE ESTATE OF SHADIAMAN HUACON,
ESSEX PROBATE COURT DOCKET
#02P-1675AD1

Plaintiff

Docket #03CV-12435RWZ

v.

UNITED STATES OF AMERICA,
Defendant

PLAINTIFF'S INITIAL DISCLOSURE

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, the plaintiff makes the following initial disclosures:

(a) **names, addresses and telephone numbers of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.**

1. Amy Rivera, 25 Jade Street, Apt. 26, Methuen, MA 01844; Telephone: 978-685-2510;
2. Kathryn Hollett, M.D., 130 Parker Street, Lawrence, MA; Telephone: 978-475-5213;
3. Mark J. Rieumont, M.D., Radiologist, Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone: 978-683-4000 x2525;
4. Alan G. Pratt, M.D., Radiologist, Saints Memorial Medical, Lowell, MA; Telephone: 978-946-8237;
5. Ross S. Berkowitz, M.D., Brigham & Women's Hospital, 75 Francis Street, Boston, MA; Telephone: 617-732-8844;

6. J. Siddigi, MD., Greater Lawrence Family Health Center, 130 Parker Street, Lawrence, MA; Telephone: 978-686-3017;

7. Blair Roberts, M.D., Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone: 978-683-4000 2660;

8. Patrick Sabia, M.D., Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone:

9. Maria Dienhart, M.D., Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone:

(b) **a copy, or description by category and location of, documents, data computation and tangible things in the possession, custody or control of the party that are relevant to the disputed facts with particularity in the pleading.**

We are in possession of medical records received from Lawrence General Hospital which also include records from the Greater Lawrence Family Health Center, bate stamped Rivera 1 through Rivera and the autopsy report bate stamped Rivera 57 through Rivera 61.

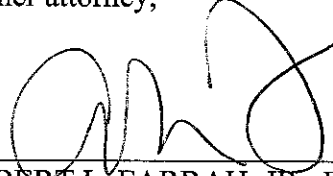
(c) **a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;**

Plaintiff will sign authorizations so that defendant may request medical bills.

(d) **for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

None exist.

Plaintiff
By her attorney,



ALBERT L. FARRAH, JR., ESQ.
One Washington Mall
Boston, MA 02108
(617)742-7766
B.B.O. #159340

CERTIFICATE OF SERVICE

SUFFOLK, SS

June
May 16 2004

A copy of Plaintiff's Initial Disclosure was today faxed and mailed to Rayford A. Farquhar, Assistant U.S. Attorney, 1 Courthouse Way, Suite 9200, Boston, MA 02210.



Albert L. Farrah, Jr., Esq.